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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Amber Williams,

Plaintiff,

v.

Berlin-Wheeler, Inc.,

Defendant

Case No.: 2:23-cv-00746-GMN-DJA

**Stipulation to extend deadline to file
the proposed discovery plan and
scheduling order**

(First request)

Amber Williams (“Plaintiff”); and Berlin-Wheeler, Inc., (“Defendant”) (jointly as the “parties”), by and through their respective counsel, hereby stipulate to extend Local Rule 26-1’s deadlines for the parties to hold their initial Fed. R. Civ. P. 26(f) conference and to file their proposed discovery plan and scheduling order (the “Deadlines”).

Good cause exists to extend the Deadlines because of excusable neglect. Due to an internal calendaring error, plaintiff’s counsel failed to reach out to defense counsel and arrange to hold the discovery conference prior to the deadline to file the proposed discovery plan and scheduling order, August 4, 2023. The Parties now need additional time for counsel to coordinate to set the discovery conference and review the proposed discovery plan and scheduling order prior to filing.

1 Additionally, the Parties are engaged in active settlement discussions that may
2 alleviate the need to submit a proposed discovery plan.

3 Therefore, it is appropriate to extend the deadlines for the Parties to file their
4 proposed discovery plan and scheduling order to allow time for the Parties to meet
5 and confer in compliance with Local Rule 26-1(b).

6 The parties hereby request to extend the Deadlines by 30 days, making the
7 new deadline for the submission of a stipulated discovery plan and scheduling order
8 on or before **September 3, 2023**. This is the first request for an extension of this
9 deadline.

10 Dated: August 21, 2023.

11 **FREEDOM LAW FIRM**

12
13 /s/ Gerardo Avalos

14 George Haines, Esq.

15 Gerardo Avalos, Esq.

16 8985 S. Eastern Ave., Suite 100

17 Las Vegas, Nevada 89123

18 *Counsel for Plaintiff Amber Williams*

19 **WRIGHT, FINLAY & ZAK, LLP**

20 /s/ Ramir M. Hernandez

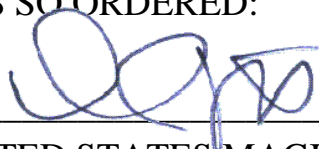
21 Ramir M. Hernandez, Esq.

22 7785 W. Sahara Avenue, Suite 200

23 Las Vegas, NV 89117

24 *Attorney for Defendant Berlin-Wheeler,*
25 *Inc.*

26 IT IS SO ORDERED:

27 

UNITED STATES MAGISTRATE JUDGE

DATED: August 22, 2023